WEST SCHEDULE 1: MICHIGAN PERFORMANCE MEASUREMENT SUMMARY

#	MEASUREMENT	CATEGORIES	W	R	MEASUREMENT TYPE	BENCHMARK	REMEDY
PRE-ORDERING							
1	Average Response Time	• Customer Service Record			• Outcome	80% ≤ 6 secs.*	(80%-X)($.50)(# of Transactions).where the # of
		• ≤ 10.000 characters	X			*CSRs ≤10.000 characters	transactions is ≤ the # of ord
		• > 10.000 characters	X				
		• Address Validation	X			80% ≤ 9 secs.	(80%-X)($.50)(# of Transactions). where # of Transactions ≤ 2(Orders)
		• Telephone Number Selection	X			80% ≤ 6 secs.	(80%-X)($.50)(# of Transactions). where # of Transactions ≤ 2(Orders)
		• Due Date Selection	X			80% ≤ 16 secs.	(80%-X)($.50)(# of Transactions). where # of Transactions ≤ 3(Orders)
ORDERING/PROVISIONING							
	Order Completion Measurements						
2	Average Installation Interval	Resale Residence POTS			• Outcome	Parity	(X-A)(25%)(RC)(Total # of Order Installations Complete
		• Field Visit	X	X			
		• Non-Field Visit	X	X			
		Resale Business POTS				Parity	(X-A)(25%)(RC)(Total # of Order Installations Complete
		• Field Visit	X	X			
		• Non-Field Visit	X	X			
		Resale Centrex				Parity	(X-A)(25%)(RC)(Total # of Order Installations Complete
		• Field Visit	X	X			
		• Non-Field Visit	X	X			
		Unbundled Loops	X			80% within 5 Days	(80%-X)(25%)(RC)(Total # c Order Installations Complete
3	Confirmed Due Dates Not Met	Resale Residence POTS			• Outcome	Parity	(X-A)(3%)(RC)(Total # of Order Installations Completed
		• Field Visit	X	X			
		• Non-Field Visit	X	X			
		Resale Business POTS				Parity	(X-A)(3%)(RC)(Total # of Order Installations Complete
		• Field Visit	X	X			
		• Non-Field Visit	X	X			
		Resale Centrex				Parity	(X-A)(3%)(RC)(Total # of Order Installations Completed
		• Field Visit	X	X			
		• Non-Field Visit	X	X			
		Unbundled Loops	X			≤ 20%	(X-20%)(3%)(RC)(Total # of Loop Installations Completed
		Interconnection Trunks	X			≤ 20%	(X-20%)(278 Minutes of Use/Trunk/Day)(Reciprocal Compensation Rate)(Average of Days Late for All Missed Trunks)(Total # of Trunk Installations)

Legend: X = TC Performance
A = Ameritech Performance
RC = Recurring Charge
($25 Resale, $9.43 Loops)

NOTE: Measures expressed as percentages are expressed as their decimal equivalents for purposes of remedy calculations.

WEST SCHEDULE 1: MICHIGAN PERFORMANCE MEASUREMENT SUMMARY

#	MEASUREMENT	CATEGORIES	W	R	MEASUREMENT TYPE	BENCHMARK	REMEDY
	Order Status Measurements						
4	Average Reject Notice Interval	Resale	X		• Outcome	80% ≤ 24 hours	(80%-X)(3%)(RC)(Total # Rejected 855s for Electroni Received Orders)
		Unbundled Loops	X				
5	Average FOC Notice Interval	Resale	X		• Indicator		
		Unbundled Loops	X				
6	Average Completion Notice Interval	Resale	X		• Outcome	80% ≤ 48 hours	(80%-X)(3%)(RC)(Total # o Completion Notices for Electronically Received Ord
		Unbundled Loops	X				
	Held Order Measurement						
7	Average Interval for Past Due Orders/Loops	Resale Residence POTS	X	X	• Indicator		
		Resale Business POTS	X	X			
		Resale Centrex	X	X			
		Unbundled Loops	X				
	Installation Trouble Measurement						
8	Installation Trouble Reports (New Service Failures)	Resale Residence POTS [Found Network Troubles (Codes 3.4, 5)]			• Outcome	Parity	(X-A)(3%)(RC)(Total # of Order Installations Completed
		• Field Visit	X	X			
		• Non-Field Visit	X	X			
		Resale Business POTS [Found Network Troubles (Codes 3.4, 5)]				Parity	(X-A)(3%)(RC)(Total # of Order Installations Completed
		• Field Visit	X	X			
		• Non-Field Visit	X	X			
		Resale Centrex [Found Network Troubles (Codes 3.4, 5)]				Parity	(X-A)(3%)(RC)(Total # of Order Installations Completed)
		• Field Visit	X	X			
		• Non-Field Visit	X	X			
		Unbundled Loops	X			≤ 6%	(X-6%)(3%)(RC)(Total # of Loops Installations Completed
	Order Quality Measurements						
9	Percentage of Order Flow Through	Resale	X		• Indicator		
		Unbundled Loops	X				

Legend: X = TC Performance
A = Ameritech Performance
RC = Recurring Charge
($25 Resale, $9.43 Loops)

NOTE: Measures expressed as percentages are expressed as their decimal equivalents for purposes of remedy calculations.

WEST SCHEDULE 1: MICHIGAN PERFORMANCE MEASUREMENT SUMMARY

#	MEASUREMENT	CATEGORIES	W	R	MEASUREMENT TYPE	BENCHMARK	REMEDY
10	Percentage of Rejected Orders (Service Order Accuracy - Electronically Received Order Quality)	Resale	X		• Indicator		
		Unbundled Loops	X				
	911 Database Update and Accuracy						
11	Customer Record Update Files Not Processed by the Next Business Day (Received Electronically)	Note: Wholesale includes facility-based carriers only. Retail includes Ameritech and non-facilities based carriers (i.e. resale).	X	X	• Outcome	Parity	(X-A)($88.08*)(Total # of Electronically Received CRU Files) *3 months of the tariffed monthly rate for 911 administration
12	Customer Record Update Files Not Processed by the Next Business Day (Received Manually)	Note: Wholesale includes facility-based carriers only.	X		• Indicator		
13	Errors in Customer Record Update Files (Received Electronically) –	Note: Wholesale includes facility-based carriers only. Retail includes Ameritech and non-facilities based carriers (i.e. resale).	X		• Indicator		
14	Errors in Customer Record Update Files (Received Manually)	Note: Wholesale includes facility-based carriers only.	X		• Indicator		
15	Erred Customer Record Update Files Not Returned by Next Business Day (Received Electronically)	Note: Wholesale includes facility-based carriers only. Retail includes Ameritech and non-facilities based carriers (i.e. resale).	X	X	• Outcome	Parity	(X-A)($88.08)(Total # of Erre CRU Files Received Electronically)
16	Erred Customer Record Update Files Not Returned by Next Business Day (Received Manually)	Note: Wholesale includes facility-based carriers only.	X		• Indicator		

Legend: X = TC Performance
A = Ameritech Performance
C = Recurring Charge
($.25 Resale, $9.43 Loops)

NOTE: Measures expressed as percentages are expressed as their decimal equivalents for purposes of remedy calculations.

WEST SCHEDULE 1: MICHIGAN PERFORMANCE MEASUREMENT SUMMARY

#	MEASUREMENT	CATEGORIES	W	R	MEASUREMENT TYPE	BENCHMARK	REMEDY
REPAIR & MAINTENANCE							
17	Mean Time to Repair	Resale Residence POTS • Regulated Wire & Equipment (Code 03) • Outside Plant (Code 04) • Central Office (Code 05)	 X X X	 X X X	• Outcome	Parity	(X-A Days)(25%)(RC)(Total # of Initial Trouble Reports Closed)
		Resale Business POTS • Regulated Wire & Equipment (Code 03) • Outside Plant (Code 04) • Central Office (Code 05)	 X X X	 X X X		Parity	(X-A Days)(25%)(RC)(Total # of Initial Trouble Reports Closed)
		Resale Centrex • Regulated Wire & Equipment (Code 03) • Outside Plant (Code 04) • Central Office (Code 05)	 X X X	 X X X		Parity	(X-A Days)(25%)(RC)(Total # of Initial Trouble Reports Closed)
		Unbundled Loops	X			≤ 36 hours (1.5 days)	(X-1.5 Days)(25%)(RC)(Total # of Measured Trouble Reports Closed)
18	Trouble Report Rate –	Resale Residence POTS • Found Network Troubles (Codes 3.4, 5)	X	X	• Outcome	Parity	(X-A)(3%)(RC)(# of Access Lines in Service)
		Resale Business POTS • Found Network Troubles (Codes 3.4, 5)	X	X		Parity	(X-A)(3%)(RC)(# of Access Lines in Service)
		Resale Centrex • Found Network Troubles (Codes 3.4, 5)	X	X		Parity	(X-A)(3%)(RC)(# of Access Lines in Service)
		Unbundled Loops	X			≤ 4%	(X-4%)(3%)(RC)(# of Loops in Service)
19	Percent Repeats – Maintenance	Resale Residence POTS • Found Network Troubles (Codes 3.4, 5) on the Repeat Trouble	X	X	• Outcome	Parity	(X-A)(6%)(RC)(Total # of Initial Trouble Reports Closed)
		Resale Business POTS • Found Network Troubles (Codes 3.4, 5) on the Repeat Trouble	X	X		Parity	(X-A)(6%)(RC)(Total # of Initial Trouble Reports Closed)
		Resale Centrex • Found Network Troubles (Codes 3.4, 5) on the Repeat Trouble	X	X		Parity	(X-A)(6%)(RC)(Total # of Initial Trouble Reports Closed)
		Unbundled Loops	X			≤ 17%	(X-17%)(6%)(RC)(Total # of Measured Trouble Reports Closed)

' egend: X = TC Performance
• Ameritech Performance
– = Recurring Charge
($25 Resale, $9.43 Loops)

NOTE: Measures expressed as percentages are expressed as their decimal equivalents for purposes of remedy calculations.

WEST SCHEDULE 1: MICHIGAN PERFORMANCE MEASUREMENT SUMMARY

#	MEASUREMENT	CATEGORIES	W	R	MEASUREMENT TYPE	BENCHMARK	REMEDY
20	Percentage of Customer Troubles Not Resolved within the Estimated Time (Missed Repair Appointments)	Resale Residence POTS	X	X	• Outcome	Parity	(X-A)(3%)(RC)(Total # of Initial Trouble Reports Clo
		Resale Business POTS	X	X		Parity	(X-A)(3%)(RC)(Total # of Initial Trouble Reports Clo
		Resale Centrex	X	X		Parity	(X-A)(3%)(RC)(Total # of Initial Trouble Reports Clos
		Unbundled Loops	X			≤ 20 %	(X-20%)(3%)(RC)(Total # Measured Trouble Reports Closed)
BILLING							
21	Daily Usage Timeliness (Not Provided on Time)	Resale	X		• Outcome	≤ 2% not provided within 5 days	(98%-X) (.000104*)($.50** of Daily Usage Records) *Daily interest rate **Estimated value of a Daily usage record
22	AEBS Bills Delivered Late	Resale	X		• Indicator		
23	CABS- Bills Delivered Late	UNE	X		• Indicator		
GENERAL							
	Systems Availability Measurement						
24	Percentage of Time Interface is Unavailable	Pre-Ordering	X		• Outcome	≤1% unavailable	(A-1%)($.50)(# of transactions where the # of transactions hav the same maximums as listed i Pre-Ordering "Average Response Time" measure
		EDI	X				(A-1%)($.50)(# of transactions where the # of transactions equals the # of orders
		Access Service Request	X				(A-1%)($.50)(# of transactions) where the # of transactions equals the # of orders
		EB/TA Trouble Entry	X				(A-1%)($.50)(# of transactions) where the # of transactions equals the # of troubles
	Center Responsiveness						
25	Average Speed of Answer – Ordering	Resale	X		• Informational		
		Unbundled Loop	X				
26	Average Speed of Answer – Repair	Resale	X		• Informational		
		Unbundled Loop	X				
	OS/DA						
27	Average Speed of Answer – OS/DA	Operator Services	X	X	• Outcome	Wholesale and retail performance is combined in a single measure	Process ensures parity, thus a remedy is not applicable
		Directory Assistance	X	X			

Legend: X = TC Performance
• Ameritech Performance
. = Recurring Charge
($25 Resale, $9.43 Loops)

NOTE: Measures expressed as percentages are expressed as their decimal equivalents for purposes of remedy calculations.

WEST SCHEDULE 1: MICHIGAN PERFORMANCE MEASUREMENT SUMMARY

#	MEASUREMENT	CATEGORIES	W	R	MEASUREMENT TYPE	BENCHMARK	REMEDY
INTERCONNECTION							
	Trunk Blockage Measurements						
28	Call Attempts Blocked	Interlata	X	X	• Outcome	Parity	Disparity negatively impacts Ameritech, thus a remedy is applied to the CLEC
		Intralata	X	X			
COLLOCATION							
29	Average Time to Respond to a Physical Collocation Request	Physical	X		• Outcome	80% within 10 Days	(80%-X)(3%)($703.69*) = Physical Collocation Reques * Monthly floor space charge 100 sq. ft.
30	Average Time to Provide a Collocation Arrangement	Virtual	X		• Indicator		
		Physical	X				
31	Percent of Due Dates Missed in Provision of Collocation Arrangements	Virtual	X		• Outcome	≤ 20 %	(X-20%)($61*)(Average No. Days Late for all Missed Virt Collocations)(Total # of Virt Collocations) *Daily project management fe equals (sum of an initial bay a one additional bay)/30
		Physical	X				(X-20%)(1/120)(COBO Payment)(Average # of Days Late for All Missed Physical Collocations)(Total # of Physical Collocations)

Legend: X = TC Performance
A = Ameritech Performance
RC = Recurring Charge
($25 Resale, $9.43 Loops)

NOTE: Measures expressed as percentages are expressed as their decimal equivalents for purposes of remedy calculations.

STATE OF NEW YORK DEPARTMENT OF PUBLIC SERVICE

THREE EMPIRE STATE PLAZA, ALBANY, NY 12223-1350
Internet Address: http://www.dps.state.ny.us

March 17, 1998

Dear Counsel:

As most of you may know, a staff team has spent much of the past several months preparing to advise the Chairman of the Public Service Commission on Bell Atlantic-New York's (Bell Atlantic) petition to the Federal Communications Commission (FCC) to enter the interLATA market. The team has discussed with the Department of Justice, companies entering the local telephone market, FCC staff and Bell Atlantic the actions that Bell Atlantic should take before the Chairman would support Bell Atlantic's petition.

Attached is a "prefiling statement," which we have drafted,[1] that addresses what we consider key issues – customer relations, rebundling, interconnection, collocation and UNEs, the operations support systems and measures to avoid backsliding. We are considering recommending to the Chairman (Public Service Law § 12) that he issue a conditional positive evaluation if Bell Atlantic-New York commits to these steps, as well as those found in its initial filing. The evaluation would be conditioned on Bell Atlantic subsequently meeting all conditions specified in the draft prefiling.

Before actually making any recommendation, however, we would appreciate additional feedback. Would the Bell Atlantic action anticipated in the draft prefiling provide competitors an opportunity to compete equitably for local telephone service? For example, would the terms of wholesale service satisfy your needs as a wholesale customer? If the answer is no, please specify why and what conditions would satisfy your needs. If either a new entrant or a facilities-based competitive local exchange company feels that the conditions set forth in Issue 2 (rebundling) would place you at a competitive disadvantage, tell us why and what conditions you feel would be fair.

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[1] This document has not been agreed to by Bell Atlantic or the Staff team.

Please structure your comments to address separately each of the five issues in the prefiling draft; that is, (1) Bell Atlantic's wholesale service; (2) rebundling; (3) interconnection/collocation/UNEs; (4) operations support systems (OSS); and (5) incentives to avoid backsliding. Comments not exceeding 10 pages should be filed in Albany no later than 3:00 p.m., March 23, 1998. If you wish to meet prior to that date, please call Andrew Klein at 518-474-1250.

Very truly yours,

Lawrence G. Malone
General Counsel

Janet H. Deixler
Managing Attorney

Andrew M. Klein
Assistant Counsel

Attachment

NEW YORK PUBLIC SERVICE COMMISSION

In the Matter of

Case 97-C-0271 - Petition of New York Telephone Company for approval of its statement of generally available terms and conditions pursuant to Section 252 of the Telecommunications Act of 1996 and Draft Filing of Petition for InterLATA Entry pursuant to Section 271 of the Telecommunications Act of 1996.

DRAFT PRE-FILING OF BELL ATLANTIC PURSUANT TO SECTION 271 OF THE TELECOMMUNICATIONS ACT OF 1996

PRELIMINARY STATEMENT

The following "Pre-filing Statement" sets forth additional commitments[1] that New York Telephone Company, doing business as Bell Atlantic-New York (Bell Atlantic-NY or the Company), will make to the Federal Communications Commission (FCC) under section 271 of the Telecommunications Act of 1996. Bell Atlantic-NY requests that the New York Public Service Commission (Chairman) indicate whether, assuming Bell Atlantic-NY meets each milestone listed below,[2] it will issue a positive recommendation on the Bell Atlantic-NY filing to the FCC. We recognize that the New York Public Service Commission will monitor compliance with each milestone and that a commitment to issue a positive recommendation would be subject to Bell Atlantic-NY satisfying all milestones prior to filing with the FCC.

This document also describes a series of significant steps that Bell Atlantic-NY has taken to (1) resolve concerns raised in reaction to our earlier filing; (2) meet the terms and conditions of the section 271 checklist; and (3) open our market to competition.

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[1] Initial commitments, which remain in effect, are found in our Draft Application for InterLATA Authority, filed February 14, 1997, and Supplemental Petition, filed November 6, 1997.

[2] As a sign of good faith, Bell Atlantic-NY has, in fact, begun many of the steps discussed below.

DRAFT DRAFT

1. ACCOUNT SERVICES

Both Bell Atlantic and the CLECs are served by having a clearly defined understanding of Account Manager responsibilities. As a result, the company will develop a comprehensive account management guide, describing the managers' roles and responsibilities. Volume 1 of the CLEC Handbook be will supplemented with the information provided in the guide, through the insertion of a summary of account management responsibilities.[1]

As part of the continuing effort to increase the accessibility and responsiveness of Account Managers, Bell Atlantic has formalized the procedures for coverage in the event Account Managers are absent from the office for more than one day for vacations, illness, training and similar occurrences. Bell Atlantic will designate alternative account managers for each account, provide each carrier with the names of those alternate account managers, and provide a voice mail greeting indicating when the alternate managers should be contacted.[2]

In addition, Bell Atlantic is providing Account Managers with tools to increase their accessibility, efficiency and capability to provide timely responses to CLEC inquiries. The Account Managers will receive laptop computers, pagers and cell phones, on or before April 15th.

Bell Atlantic is also in the process of adding a director and two technical support staff to work with the account managers, to help provide technical resources within the Account Management Organization, support the Account Managers in dealing with complex technical issues associated with network build-outs, and make the managers more available for other functions. These additional personnel should be in place by April 1.

By way of further assurance of Bell Atlantic's commitment to provide prompt responses, the company has reinforced and formalized its commitment to return customer

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[1] The account management guide has been released.

[2] This effort has also been completed.

calls on the day in which they are received, if the manager is in the office, but in no event later than the next business day.[1]

In response to questions regarding how Account Managers are allocated among CLECs, Bell Atlantic has prepared a description of what key measurements are utilized in allocating managers and in evaluating when to add additional managers. Bell Atlantic currently evaluates its managers on a semi-annual basis, based primarily on qualitative measures. In addition, the company considers:

- Number of accounts handled
- Geographical coverage of the accounts handled
- Number of network build outs
- Number of network planning sessions
- Number pre-ASR (Access Service Request) sessions
- Number of NDR (Network Design Review) sessions
- Number of customer training sessions coordinated
- Number of calls received and returned within one business day
- Number of electronic OSS (Operation Support System) interfaces established

As a way of obtaining CLEC feedback on managerial performance and customer satisfaction, Bell Atlantic proposes that a users group for facilities-based CLECs be created, similar to the Telecommunications Resellers' Association Reseller User Group. Bell Atlantic agrees to consider and provide formal responses to all user group recommendations and act upon them where appropriate.

Escalation of CLEC Inquiries

The escalation procedure works as follows: Should a CLEC report a non-service affecting condition, and the condition remains unresolved after two hours, the Bell Atlantic representative communicates that fact to the CLEC. The CLEC can then choose to escalate to the first level Manager, who would then have three hours in which to resolve the condition. Should the condition remain unresolved, the matter is then escalated to the second level Manager, and then, at the end of the day to the Bell Atlantic Director. For reports concerning

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[1] This task was completed on March 1.

out-of-service conditions, the same procedures would be followed, but with one hour shorter timeframes.

Recognizing the need for clearly defined internal escalation procedures, Bell Atlantic has produced internal escalation procedures for both the resale center and the carrier account team center. These procedures have been made available on the Bell Atlantic Website and will be communicated to all CLECs at their initial and monthly operations meetings.

Bell Atlantic has developed a shared database software program of escalation incidents for both resale and unbundled elements. The database delivery and tracking of escalations for resale was started January 27, 1998, while the unbundled element database became operational in February. This database will allow Bell Atlantic and PSC Staff to assess the types of escalations that are occurring, their frequency, and the overall percentage of orders that are escalated.

Documentation and Information Bell Atlantic Provides to CLECs

In order to provide adequate documentation to allow CLECs to interact efficiently with Bell Atlantic systems and employees, Bell Atlantic has committed to continually update the information contained in the CLEC handbooks. Individual page or section updates will be sent to CLECs via mail, and all updates will be posted on the Bell Atlantic Website at least quarterly.

Bell Atlantic will continue to provide notification of "quiet periods" resulting from tandem software upgrades, and has committed to provide notice of changes in those schedules as they occur, and at least 30 days in advance of any period. In urgent circumstances, such as when service-affecting software glitches or hardware/software compatibility problems occur, Bell Atlantic will provide notice to all CLECS as soon as Bell Atlantic becomes aware of the need to modify the quiet period schedule. Such circumstances arise very infrequently (in the last two years, only three such occasions arose). In addition, Bell Atlantic will have completed all end office switch upgrades by April 15th, thereby eliminating the need for end-office quiet periods.

Bell Atlantic will also continue to provide and update the list of central offices that have physical collocation space constraints, as well as those that have only unconditioned space remaining. Beginning March 28th, these will be provided to both CLECs and the PSC, and will also be posted on the Bell Atlantic Website.

The Carrier Account Team Center and Resale Center

As with Account Management, both Bell Atlantic and the CLECs benefit from a clearly defined identification of staff responsibilities. Therefore, Bell Atlantic has developed a list of these responsibilities, which were included in the CLEC handbook and are available on the Website home page.

To ensure that these centers are providing quality service, Bell Atlantic measures the number of requests received, as well as the timeliness and accuracy with which they are processed (e.g. firm order confirmation timeliness, service order query timeliness, completion notification timeliness and processing intervals). Order accuracy is measured both internally and externally, as query rates are measured to determine the accuracy of the orders received from CLECs and resellers, and internal order accuracy is measured via post completion discrepancies (PCD) reports and representative quality review. The PCD numbers are reported to the PSC.

To provide parity with the way Bell Atlantic handles large retail accounts, the company has begun to provide resale customers with a "Single Point of Contact," who then interfaces with other Bell Atlantic units on the reseller's behalf. Bell Atlantic plans to implement a similar program for the CATC by the end of April.

DRAFT DRAFT

2. COMBINATIONS OF ELEMENTS

Bell Atlantic commits to provide combinations of network elements, and the complete Unbundled Element Platform to CLECs for service to residential and business POTS customers, in the geographic areas and on the terms reflected on the chart that follows:

PLATFORM PROPOSAL - RESIDENCE & POTS BUSINESS (WITH OR WITHOUT OS/DA)							
AREA		VOICE GRADE			ISDN-BRI		
	Description[1]	NRC	Monthly[2]	Duration	NRC	Monthly	Duration
		RESIDENCE					
A	Zone 1	$0	$1	3 years	$0	$0	3 years
B	Zone 2	$0	$0	5 years	$0	$0	5 years
		BUSINESS POTS					
A	NYC			N/A			N/A
B	Zone 1 (minus NYC)	$0	$6	3 years	$0	$0	3 years
C	Zone 2	$0	$4	5 years	$0	$0	5 years

[1] Zone definitions are the same as those established by the Commission in Cases 94-C-0095, 95-C-0657 and 91-C-1174.

[2] The monthly charge listed is in addition to the sum of the UNB prices established by the Commission.

Upon the expiration of each period set forth under the Duration category, charges for existing platforms will be adjusted over a three year period to equate the platform price with the resale price. After the Duration period has expired, CLECs who have not previously served customers in the applicable zone through the UNE-P may provide service to customers through UNE-P at the resale price for the longer of two years from the end of the Duration period or whenever the area is deemed substantially competitive.

In New York City, where the platform is not available for business customers, and in other areas where the platform becomes unavailable, Bell Atlantic-NY commits to provide terms for collocation which are more favorable to requesting carriers than those provided in the other areas. These include, at the option of the requesting carrier: smaller collocation cages, sharing of collocation cages, non-cage physical collocation, and reasonable recombination of elements through virtual collocation.

In all geographic areas and for all classes of service (regardless of whether the unbundled element platform is available), Bell Atlantic-NY will provide combinations of UNEs less than the total platform (that do not involve combining the company's link with the company's port) at TELRIC prices. Bell Atlantic-NY may seek authority from the NYPSC for an additional charge to the requesting carrier for these services. The establishment of such additional charge will be in the discretion of the NYPSC or other agency with the statutory authority to review these rates. Where a functionality for the provision of local service requested by a carrier through unbundled network elements is available through a retail service offered by Bell Atlantic-NY, the functionality may be provided through that service, and will be priced at no more than the sum of the unbundled element prices. In addition, Bell Atlantic-NY will provide the extended loop (unbundled loops plus transport and multiplexing) to CLEC collocation cages or CLEC premises at the TELRIC price for the loop and transport elements, and the TELRIC or the retail price less the wholesale discount for the multiplexer. Upon request, if it is technically feasible, Bell Atlantic-NY will also provide concentration equipment in its end offices, compatible with the industry standards, at TELRIC prices.

3. INTERCONNECTION AND UNBUNDLED NETWORK ELEMENTS

A. Interconnection

Electronic Trunk Ordering

BA-NY currently uses the Network Data Mover (NDM) to provide the electronic ordering ability to the IXCs and CLECs for trunk provisioning. This system, which has been used extensively by the IXCs over numerous years for handling Network Interconnection Access Service Requests (ASRs) for trunking, was reformatted to handle Network Interconnection Local Service Requests (LSR's) from CLECs for their trunking needs.

From a system hardware and software perspective, the existing infrastructure of a T1.54 line network interface and associated system software already exists for the CLECs to use. This includes such CLECs as Teleport, ATT & MCI. Bell Atlantic-NY will ensure that the NDM System is available to all CLECs, and will review its capabilities with those that are current system users, by May 15.

Interval for Network Interconnection Trunks

Since the start of 1997, Bell Atlantic-NY has reduced its trunk provisioning interval from 43 business days to a fourth quarter average of 33 business days. Bell Atlantic-NY has also eliminated all past due orders for network trunk interconnection through infrastructure additions and process improvements.

Bell Atlantic-NY expects to further reduce the trunk provisioning interval over the course of 1998, and is striving to set an interval objective of 18 days for all interconnection trunks, excluding only orders greater than 192 trunks and complex jobs, which will carry intervals of 30 business days or negotiated due dates, respectively. Installations of network dialing plans, which are formulated through the NDR process, will also be negotiated.

Industry-wide use of the forecasting process developed in the carrier-to-carrier collaborative process will be key to achieving the stated objective. These forecasts are to be provided semi-annually, with a minimum six months lead time before the requested in service

date. Bell Atlantic-NY has provided the CLECs with all details on how and when forecasts should be provided, and has committed to meet the 18 business day interval for interconnection trunks forecasted in accordance with those procedures beginning May 15.

Availability of Two-Way Trunking

1. Current Status:

Two-way traffic exchange trunks provide for the transmission and routing of traffic in both directions on a single trunk group by both the CLEC and Bell Atlantic. Although Bell Atlantic currently provides over three thousand two-way trunks to one CLEC in New York State for the exchange of local interconnection traffic, these trunks are provided on a flat-rated basis, with reciprocal compensation based upon periodic and mutual traffic studies.

MCI and other CLECs have indicated an interest in two-way trunks on a measured-use basis. Bell Atlantic-NY has agreed to develop such a service offering, and will continue with the trial of two-way trunking currently underway with MCI until its successful conclusion.

2. Future Offering:

Bell Atlantic-NY and MCI have initiated an operational trial for two-way trunks with usage measurements, for mutual approval, which will enable the parties to assess the success of the trial in June. Bell Atlantic-NY will deploy, upon receipt of a specific CLEC request, the necessary additional equipment, and will have a general service offering of two-way trunks on a measured-use basis by July 1, 1998. This two-way trunking offering, with reciprocal compensation based on minutes of use, will only be available on trunks that use SS7 signaling and have the Hewlett Packard measurement equipment in place to measure the traffic in both directions.

Technically, these two-way trunks will require the Hewlett Packard CDR7 SS7 Usage Measurements and Monitoring System for the purpose of measuring and recording AMA billing information on two way SS7 trunk groups simultaneously in both directions between the Bell Atlantic and CLEC switches. The HP CDR7 tool must be loaded at the STP pairs connected to the SS7 links. The system must be in place at the appropriate STP locations and

must have connectivity to the appropriate SS7 links for two way trunking with usage measures to occur.

Design and implementation of the trunk groups will be based on forecasts from the CLEC. The trunks will be interconnected from the Bell Atlantic end office to the CLEC switch, and Bell Atlantic will provide transport on the two-way trunk groups at a DS-1 interface. Bell Atlantic-NY will also provide servicing and administration.

64 Clear Channel Availability

1. Network Infrastructure Investments

Bell Atlantic-NY has addressed the concerns related to 64 Clear Channel availability through extensive infrastructure additions and software upgrades. The equipment needed to provide 64 Clear Channel capability in an ESS tandem is a SM-9 circuit pack plug-in card, which will provide for 24 DS-0 channels of 64 kilobyte Clear Channel capability. Although earlier versions required lengthy provisioning intervals and necessitated significant rearrangements, the installation of 4E21 software provided two additional capabilities to provision 64 Clear Channel more efficiently. Specifically, the new software permits the replacement of 1 SM-1 card at a time, and permits initial provisioning of 100% 64 Clear Channel.

2. Current and Future Clear Channel Availability

The capacity of an XTSI frame is 168 T-1s or 5,032 DS-0 channels of 64 Kilobyte capacity. The XTSI frame equipment needed to provision the 64 Clear Channel trunks on the 4ESS is new technology, which will now be used to satisfy all types (56/64 kb) of interconnection trunks on a going forward basis. Bell Atlantic-NY has made 39,384 DS-0 channels of 64 Kilobyte clear channel capacity available in the fourth quarter of 1997. During 1998, Bell Atlantic-NY will complete an additional 180,000 clear channel-capable tandem trunks, giving Bell Atlantic-NY a total capability of provisioning 219,384 clear channel trunks in 1998.

There are currently no past due orders held for facilities for 64 Clear Channel service, and Bell Atlantic-NY will provision all future clear channel service requests (excluding complex jobs & orders greater than 192 trunks) within the standard interval prevailing for all other trunk types. While orders from CLECs entering the market who are in the NDR process to establish their local dialing plan will be excluded, the standard interval will apply after completion of the NDR process.

Tandem Sector Routing

Particular calls can take either a "direct" route or a "switched" route from one switching center to another. These direct routes are high usage groups that allow the routing of calls directly from the originating to the terminating point. When all trunks in a high usage group are busy, calls attempting to access that high usage group are directed as overflow to other alternate routes, normally through the tandem. A high usage group is always engineered to be backed by an alternate route via a tandem connection which acts as a final trunk group for call completion. This interchange and overflow of calls between direct end office trunks and alternate tandem connections is the normal and customary way of providing diversity within the Bell Atlantic-NY network.

The tandem as an intermediate switching system interconnects a large number of switches with a geographic community of interest by trunk group. This integration of local end offices and a serving tandem with geographic communities of interest is called tandem sector routing. However, because the cost of routing a call through an access tandem is greater than that for routing a call directly, a direct path (direct end office trunks) may satisfy demand more economically if the community of interest is high between two points. In these circumstances only the overflow would then be handled through the local serving tandem.

In other circumstances, there is a community of interest between two points that lie outside of the normal tandem serving sector. Where there are large volumes of calls, for example, between Fire Island or South Hampton, Long Island (two vacation spots popular with NYC residents) and locations in New York City, a more efficient routing plan is

employed called alternate tandem sector routing. Alternate tandem sector routing works on the same theory as direct end office trunking, which is to complete calls in the most efficient manner possible.

Bell Atlantic-NY will provide similar routing to CLECs who believe that they warrant such routing, at CLEC cost. Since current trunks are paid for based on per-minute usage charges, Bell Atlantic may propose an additional charge for trunks used solely for route diversity as these trunks may have significantly less traffic.

B. Collocation

Bell Atlantic-NY will fully comply with the terms of the PSC Order issued March 3, 1998, on non-price terms and conditions for collocation. Before it can be considered to have achieved the collocation requirements of the §271 checklist, Bell Atlantic-NY will demonstrate that it is able to provision virtual collocation within the prescribed 105 day time interval, and that the installations will function as intended.

Forecasting

Bell Atlantic-NY will request forecasts on a semi-annual basis, for a two-year period. Information requested will include central office, month applications are expected to be sent, requested in-service month, preference for virtual or physical, and square footage required (physical) or high-level list of equipment to be installed (virtual).

With regard to the use of forecasting data, Bell Atlantic-NY will post aggregate forecasting data on the web within three weeks of the close of the forecasting window. Posting will include the COs requested, the number of virtual and physical applications for each CO, and any space constraints. In addition, the company will perform reviews of requested COs to identify potential problem sites based on the next six months of forecasts, consider forecasts in staffing decisions, and enter into planning discussions with forecasting CLECs to validate forecasts, discuss flexibility in potential trouble areas and assist in application preparation.

Formal forecast requests will be sent to the CLECs semi-annually, as indicated above. The first forecast will be used to gauge whether demand is greater than current estimated Bell Atlantic-NY capacity (i.e. more than 20 per month, more than 8 in a geographical area, or more than 3 on a single day). Bell Atlantic-NY will provide a written report in April to the PSC regarding the analysis of the forecasts, subsequent discussions with the CLECs, and resulting action plans for both Bell Atlantic-NY and the CLECs. Several scenarios could develop:

a. If the near-term (6-month) forecast is within Bell Atlantic-NY's current capacity, Bell Atlantic-NY will be accountable for meeting standard intervals subject to the limitations described in the Space Limitations and the Collocation Process sections of this document.

b. If the overall forecast indicates spikes in demand, Bell Atlantic-NY will attempt to smooth the demand through discussions and negotiations with the CLECs.

c. Should Bell Atlantic-NY and the CLECs fail to agree to smooth demand, Bell Atlantic-NY will estimate the increase in cost and capacity, both internal and external (vendors), within three weeks of the disagreement and work with Commission staff to determine whether such additional expenditure is warranted and to evaluate cost recovery options.

d. If the forecasts indicate a sustained need to provide more than Bell Atlantic-NY's current capacity, Bell Atlantic-NY will need to augment its workforce and work with the various vendors to prepare for the increase in demand. Bell Atlantic-NY will ramp up its workforce based on forecasts if it is assured that the CLECs are similarly held accountable for the accuracy of their forecasts. The PSC will examine the issue of accountability following the April, 1998 report to the Commission.

Staff and Bell Atlantic-NY acknowledge that the forecasting process for collocation arrangements is new. Therefore, after the initial forecasts are received from CLECs, and Bell Atlantic-NY has assessed its ability to meet the forecasted demand, Staff and Bell Atlantic-

NY will meet to consider possible revisions to the forecasting process and resulting actions and obligations.

Unforecasted demand will be given a lesser priority than forecasted demand. Bell Atlantic-NY will make every attempt to meet standard intervals for unforecasted requests; however, should unanticipated requests push demand beyond Bell Atlantic-NY's capacity limits, Bell Atlantic-NY will negotiate longer intervals as required (and within reason). As a rule of thumb, forecasts received less than three months prior to the application date may postpone the interval start date as follows:

Forecast Received	Interval Start Date Commences
No Forecast Received	3 months after application date
Forecast received 1 month prior to application date	2 months after application date
Forecast received 2 months prior to application date	1 month after application date
Forecast received 3 months prior to application date	On the application date

All such interval adjustments will be discussed with the CLEC at the time the application is received. Although formal forecast requests will be submitted on a semi-annual basis, the CLECs should proactively update the near-term (6-month) forecasted application date going forward.

Where Bell Atlantic-NY has a written guarantee of reimbursement, it will examine forecasts for offices in which it is necessary to condition space, and discuss these forecasts with CLECs to determine the required space to be conditioned. If Bell Atlantic-NY commits to condition space based on forecasts, CLECs assigned space will give Bell Atlantic-NY a

non-refundable deposit equal to the application fee, with a signed commitment to fund its proportionate share of the conditioning costs.

Space Limitations

When no space is available for physical collocation, Bell Atlantic-NY will inform the PSC as soon as it knows it will be unable to fulfill a request, based on applications, 6-month forecasts, or as soon as it otherwise becomes aware that there is no further space available for physical collocation. Bell Atlantic-NY will post a list of all such sites on its Website, and will update the list as additional constraints become known.

When forecasts indicate that all requests cannot be fulfilled in a particular central office due to limited available space, Bell Atlantic-NY will inform all forecasting CLECs of the total square footage available and the total number of CLECs requesting space in that CO. It will offer each CLEC an equal share of the central office space, and request applications immediately, with appropriate fees, to reserve the space. Each CLEC will have one month to respond. If a CLEC does not respond within the specified time, its apportioned share will be allocated evenly among those that do respond.

If there is not enough space available to provide all requesting CLECs with a minimum configuration (i.e., 25 sq. ft. for recombinations, 100 sq. ft. for standard transmission equipment), Bell Atlantic-NY will hold a drawing for the space, with appropriate guidance and participation from the Commission. Bell Atlantic-NY will inform each CLEC of the number of requesting CLECs and the quantity of CLECs that can be accommodated in the available space. It will request applications immediately, with appropriate fees, to enter the drawing.. Each CLEC will have one month to respond or be ineligible for the drawing. Bell Atlantic-NY will then forward the list of qualifying applications to the Commission staff. Applications and associated fees will be returned to those not selected in the drawing.

Verification of Space Limitations Claims

Bell Atlantic-NY will provide the PSC staff with floor plans, future use information, site visits, etc., as requested by the PSC staff. Bell Atlantic-NY will provide an escort who will be able to answer questions about present and future use of space, and will provide construction plans for empty space upon PSC staff request. Staff walk-throughs of offices may include a CLEC representative, either the requesting CLEC or a neutral CLEC, upon the signing of a confidentiality agreement. If, after staff walk-through and analysis, there is a disagreement about the space constraint, staff will discuss with Bell Atlantic-NY and may at that time bring in a neutral third party for technical assistance.

Cost Recovery for Conditioning Space

In an attempt to meet the interests of the CLECs in reducing the up-front space preparation costs associated with physical collocation, and in accordance with the PSC Order of March 3, 1998, Bell Atlantic-NY will implement the following two-step cost recovery mechanism:

1. A CLEC interested in collocating in a Bell Atlantic-NY central office with no conditioned space available will only be required to pay for the costs Bell Atlantic-NY incurs to condition the amount of space needed to provide collocation to that CLEC. For instance, if Bell Atlantic-NY incurs $250,000 in order to condition the appropriate amount of common space as well as providing for 1,000 sq. ft. of usable space which will be available for collocation, and a given CLEC only requires 1/10 of that space or 100 sq. ft., that CLEC would pay Bell Atlantic-NY a non-recurring charge of $25,000. (If the collocator has under $2 billion in revenues per year, it may pay this non-recurring charge on an installment basis pursuant to the non-recurring amortization plan filed with the Commission in November 1997). CLEC concerns regarding what amount of space Bell Atlantic deems appropriate for conditioning will be brought to the PSC for resolution.

2. The unrecovered costs for both the common space and non-subscribed space ($225,000 for this example) would be recovered as follows:

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a) These unrecovered costs should be amortized over a five year period. The amortization and recovery of these costs will begin after 18 months.

b) The amortized unrecovered costs will be calculated by LATA (LATA 132, however, will be subdivided into Manhattan, Long Island, and the rest of the NY Metro LATA).

c) All CLECs physically collocated in the specific LATA, or the specified area in the 132 LATA, will be required to pay Bell Atlantic-NY a portion of the amortized unrecovered costs based upon their percentage of the total square feet of collocation space in that LATA or area. If, for example, there were four CLECs physically collocated in a given LATA and each had an equal portion of the provided square footage, then each CLEC would pay 1/4 of the amortized unrecovered costs for that year.

d) The amortized amount to be recovered from these CLECs would be reduced each year if subsequent collocators or Bell Atlantic-NY occupy the prepared collocation space.

e) The amount to be recovered will be adjusted to reflect uncollectible revenues.

f) If Bell Atlantic uses any of the space so conditioned, it will bear the same share of the costs that would otherwise have been borne by the CLECs.

The amount paid by subsequent collocators would also be reduced by the non-subscribed and common space costs already recovered from other CLECs. Recalculating the initial cost for future collocators will eliminate the possibility of double recovery. Using the above example, the initial collocator utilizing 100 square feet of this prepared space during the first year of the recovery period would pay Bell Atlantic-NY $250 per foot. If a subsequent collocator requests 100 square feet of this prepared space during the first year of the recovery period, it would be charged only $210 per square foot, reflecting the fact that a portion of the non-subscribed and common space costs has already been recovered from other CLECs.

<u>When Raw Space is Available at Additional Cost</u>

Raw space conversion timeframes fall outside the normal intervals and are negotiated on an individual case basis based on negotiations with the site preparation vendor(s). Bell Atlantic-NY will use its best efforts to minimize the additional time required to condition collocation space, and will inform the CLECs of the time estimates as soon as possible.

Bell Atlantic-NY will inform the PSC as soon as it knows it will require raw space conversion to fulfill a request based on application or forecast. Bell Atlantic-NY will post a list of all such sites on its Website, and will update the list as additional locations become known.

BA-NY Capacity

Bell Atlantic-NY's estimate of its present capacity of 15 to 20 collocation arrangements per month is based on current staffing and current vendor arrangements. As discussed in the forecasting section of this document, Bell Atlantic-NY will evaluate the first forecast results (expected in March), to determine if this capacity is sufficient. If it is insufficient, Bell Atlantic-NY will attempt to smooth spiky demand via negotiations with the forecasting CLECs, and/or augment its workforce for sustained demand beyond its capacity if demand is tied to binding forecasts.

Vendor Capacity

Bell Atlantic-NY will continuously seek to improve vendor performance for all central office work, including collocation. Since the vendors require notice in order to meet increases in demand, Bell Atlantic-NY will share CLEC demand with appropriate vendors as required, subject to the appropriate confidentiality safeguards. Bell Atlantic-NY will seek assistance from the CLECs to resolve vendor inability to meet demands. CLECs may also contract with vendors directly, for a variety of the functions required:

a. Physical Collocation: The CLECs can contract directly for site preparation, cage construction and POT bay installation.

b. Virtual Collocation: The CLECs can contract directly for transmission equipment engineering and installation and fiber splicing.

Bell Atlantic-NY may be excused for vendor delays, due to circumstances beyond Bell Atlantic-NY's or the vendor's control, as established in a reasonable force majeure clause.

Responsibility for Vendor Delays

No party shall be excused from their obligations due to the acts or omissions of a Party's subcontractors, material men, suppliers or other third persons providing such products or services to such Party unless such acts or omissions are the product of a Force Majeure Event, or unless such delay or failure and the consequences thereof are beyond the reasonable control and without the fault or negligence of the Party claiming excusable delay or failure to perform.

Measured Intervals

Bell Atlantic-NY will meet the 76/105 day intervals for all requests which were properly forecast 6 months prior to the application date, subject to the conditions described thus far, as well as the limitations below.

a. In both virtual and physical collocation, the CLEC and Bell Atlantic-NY control various interim milestones they must meet to meet the overall intervals. The interval clock will stop, and the final due date adjusted accordingly, for each milestone the CLEC misses (day for day). Interim milestones were depicted in Attachment 6 of the first Maguire affidavit, for both virtual and physical. Virtual interim milestones were discussed in the second Maguire Affidavit, issued on January 6.

b. When Bell Atlantic-NY becomes aware of the possibility of vendor delays, it will first contact the CLEC(s) involved to attempt to negotiate a new interval. If Bell Atlantic-NY and the CLEC cannot agree, the dispute will be submitted to the Director of the Communications Division of the DPS for prompt resolution.

C. Unbundled Elements

Bell Atlantic-NY commits to provide all Unbundled Network Elements in accordance with the requirements of the Act, particularly with regard to sections 251 and 252. Except where there are technological impediments, Bell Atlantic-NY will permit carriers with access facilities to commingle unbundled elements with access traffic for transport where there is excess capacity over the access facilities.

1. Hot Cut and Loop Provisioning Intervals and Performance

The current standard offered intervals are as follows:

LINKS:	
Basic Link (SVGAL) - Hot Cut	5 days
Basic Line (SVGAL)(2 Wire Analog) - New Line: (a) 1-5 lines (b) 6-9 lines (c) 10+ lines	 Smarts Clock 10 days Negotiated
Premium LINK (Two-Wire Digital) - New Line: (a) 1-5 lines (b) 6-9 lines (c) 10+ lines	 Smarts Clock 10 days Negotiated

Bell Atlantic-NY reports, on a monthly basis, the intervals offered and met, and will meet all stated intervals at the levels established in the service quality collaborative.

2. Premium Loops: Availability and Verification Process

Bell Atlantic-NY will provision, in the standard intervals for loops, the following premium loop types: 2-wire digital loop - ISDN qualified, 4-wire digital loop - 1.544 MBPS, 4 wire digital loop - 45 MBPS qualified. The process to verify availability of ISDN qualified loops is a follows:

1. The CLEC initiates a pre-order request for Loop Qualification through DCAS. This request flows through Bell Atlantic-NY's Phoenix system which queries the loop

inventory database to determine whether the necessary loop is ISDN qualified. The response is sent back through Phoenix and back through DCAS to the CLEC. This process can also be performed manually if a Pre-Order Loop Qualification request is not received via DCAS.

2. The process to verify availability of 1.544 MBPS qualified loops or 45 MBPS qualified loops will follow the same process Bell Atlantic-NY utilizes for its own services. Once a request is received by Bell Atlantic-NY, notification of the request is sent to the appropriate engineering office, where an engineer researches the facility records and responds back to the TISOC whether facilities are available.

3. The verification process for these services is the same for both CLEC and Bell Atlantic-NY customers. This process is built into the standard interval for all retail and wholesale customers.

Installation of UNE Loop Currently on Bell Atlantic-NY Integrated Subscriber Loop Carrier (IDLC)

If an existing Bell Atlantic-NY customer chooses to take service from a CLEC and the CLEC wants to use the existing Bell Atlantic-NY equipment and facilities as separate UNEs, Bell Atlantic-NY will make every effort to reuse elements of those existing facilities to the extent they meet CLEC order specifications. This is not possible when a CLEC orders a loop to serve a customer that Bell Atlantic currently serves using Integrated Subscriber Loop Carrier. In such a case, Bell Atlantic will provide new facilities or other existing plant to provide UNE service. Appropriate service order notations and facility assignment processes assure that this transaction occurs. The change of facility to provide this CLEC service will have no impact on the standard interval.

3. Unbundled Local Switching

The purpose of the Network Design Request Process (NDR) is to provide a means to design, order and implement a CLEC's network in an unbundled environment. This network establishes the CLEC's presence in the Bell Atlantic-NY network and creates a platform upon which end-user services will be overlaid.

In general, the NDR process provides a means to create the CLECs switch presence and a network over which the CLECs end-user traffic will be processed. In addition, the NDR negotiations clarify the Bell Atlantic-NY/CLEC relationship, respective responsibilities and how business will be conducted with one another.

Each NDR is unique to the CLEC's request. Bell Atlantic-NY has established, however, intervals for the creation of office dialing plans and line class codes when customized routing is not requested, and for the unbundled network elements requested by the CLEC during the NDR process itself.

Bell Atlantic has committed to meet the following intervals for provisioning unbundled local switching ports:

- Unbundled switch ports alone: 2 days
- Switch port and loop (platform):

  Existing facilities (Hot Cut Basis) - 5 days

  New order - Smarts clock

4. Signaling and Call-related Databases

Bell Atlantic-NY provides CLEC access to its call-related databases and signaling systems in accordance with the checklist. Bell Atlantic-NY has the capability to exchange TCAP messages for AIN services, and is currently working with AT&T toward the exchange of TCAP messages for AIN services.

4. OPERATIONS SUPPORT SYSTEMS (OSS)

Standards

Bell Atlantic-NY will provide non-discriminatory access to its operational support systems (OSS) on appropriate terms and conditions. In furtherance of this goal, Bell Atlantic-NY will make available, for CLECs using interconnection, unbundled network elements and total service resale, electronic OSS for pre-ordering, ordering, provisioning, maintenance and repair, and billing. Among other things, these systems will permit competitors to obtain pre-ordering information, submit service orders for resold services and unbundled network elements (UNEs), submit trouble reports, and obtain billing information. Access to the electronic OSS will include both an application-to-application interface, which will allow CLECs to tie their OSS directly to Bell Atlantic-NY's OSS via this interface, and, as an alternative, a graphical user interface (GUI) for the use of CLECs who do not find it feasible to use an application-to-application interface.

With respect to pre-ordering and ordering, the OSS will be fully integratable so that CLEC representatives can provide seamless support for pre-ordering and ordering functions. To this end, Bell Atlantic-NY will design an application-to-application interface for pre-ordering, using a format which will enable CLECs to build out to it. To the extent that the design criteria and business rules to be applied to this interface have not been fully developed by the ATIS Ordering and Billing Forum (OBF), or if there are OBF standards, but modifications may be appropriate, Bell Atlantic-NY will work collaboratively with the CLECs in the ongoing proceedings in Case 97-C-0271 to develop and disseminate them. This will be available in time so that it can be tested, in the context of the independent, third-party test described herein.

With respect to maintenance and repair functions, Bell Atlantic-NY will develop non-proprietary, commercially viable OSS sufficiently in time so that it can be tested, in the context of the third-party test described herein, to determine whether it can meet expected

volume levels. In addition, Bell Atlantic-NY commits to the development of an electronic bonding interface for OSS for maintenance and repair functions.

Bell Atlantic-NY will provide necessary technical support to assist CLECs in building to each interface, as well as in understanding how to implement and use the OSS functions available to them. Bell Atlantic-NY will provide CLECs with the information necessary to format and process their electronic requests so that these requests flow through the interfaces, the transmission links, and into Bell Atlantic-NY's legacy systems as quickly and efficiently as possible. Such support will consist of appropriate documentation, including:

- technical reference manuals and users' guides;
- specifications instructing CLECs on how to modify or design their systems to communicate with Bell Atlantic-NY's interfaces and OSS, including full documentation of the Applications Programming Interface (API) for all application-to-application interfaces;
- information necessary to format and process their electronic requests so as to enhance complete flow-through of information, including syntactical requirements, internal business rules, ordering codes [including information concerning universal service ordering codes (USOCs) and field identifiers (FIDs) used by Bell Atlantic-NY], and other information necessary to "pre-validate" service orders in a manner equivalent to that used by Bell Atlantic-NY for its orders;
- a procedure for updating all documentation.

In addition, Bell Atlantic-NY will provide technical support for CLECs experiencing difficulty with these interfaces and an established change management process for dealing with changes to the OSS interfaces and the OSS underlying the interfaces. Bell Atlantic-NY will provide an electronic method for disseminating information regarding such changes. When an OSS interface or system is updated or replaced, Bell Atlantic-NY will maintain backward compatibility for a commercially reasonable period of time, as set by the PSC.

Bell Atlantic-NY will maintain one or more service centers or help desks that CLECs can contact for support purposes; the centers will have sufficient hours of operation, including outside of regular business hours, and will be staffed by an adequate number of persons with the appropriate expertise to provide the necessary support.

Bell Atlantic-NY's support processes will accommodate reasonably foreseeable transaction quantities, and will be scalable to meet increases in demand over time. The OSS will provide CLEC representatives with functionality equivalent to that provided to Bell Atlantic-NY's retail representatives and will flow through all types of orders at rates which are at parity with the rates at which analogous orders provided by Bell Atlantic-NY's own retail operations flow through. Bell Atlantic-NY will demonstrate that flow-through for all UNE orders--in particular end-to-end platform orders--is at parity with flow-through for analogous Bell Atlantic-NY orders.

Before Bell Atlantic-NY will be considered to have met these standards, it will have instituted the performance measures required by the NYPSC, so that it is able to generate meaningful performance reports for a reasonable period in advance of its application.

BA-NY's OSS will operate and be designed so as, to the extent possible, to streamline forms and fields, minimize repetition of information to be submitted by the CLECs which is already known to Bell Atlantic-NY, and to avoid disruption of an end-user's service. In particular, Bell Atlantic-NY will provide migration "as is" and migration "as specified" for both resale and UNE orders.

In sum, Bell Atlantic-NY will demonstrate its compliance with requirements in three ways:

- where there is commercial usage, using actual performance data;
- where competitive carriers are prepared to use Bell Atlantic-NY OSS systems, by carrier-to-carrier testing; and
- an independent third-party test as described below.

In addition, the results of any internal testing will also be considered.

Independent Third Party Test

Bell Atlantic-NY acknowledges that it will not be considered to have met the OSS standards described above until it has provided evidence that its OSS systems are operationally ready and provide the appropriate level of performance. To demonstrate that it has achieved the standards described above, Bell Atlantic-NY will provide full cooperation to a third party test of its systems. Bell Atlantic-NY understands and agrees that this test will be conducted under the supervision of DPS staff, with the assistance of an independent consultant or consultants selected by DPS staff. Although Bell Atlantic-NY commits to paying the costs of the third party test, the consultant(s) will report directly to DPS staff, and will have no reporting relationship with Bell Atlantic-NY.

The test will begin when Bell Atlantic-NY has made all necessary enhancements to its OSS to enable them to provide the standards of performance described above. Bell Atlantic-NY's cooperation in the test will include, but not be limited to:

- provision to the consultant of the documentation and support which would be necessary for a CLEC to access and use the Bell Atlantic-NY OSS systems;
- demonstration that Bell Atlantic-NY's systems provide all requisite functionalities, are operationally ready, provide a level of performance which is, at a minimum, equivalent to that specified in the interim carrier-to-carrier service standards developed in the context of Case 97-C-0139, to the satisfaction of DPS staff, and are scalable to reasonably foreseeable volumes of orders; and
- demonstration that Bell Atlantic-NY is able to generate meaningful reports of its performance pursuant to these standards.

If a Bell Atlantic-NY interface fails to achieve the required level of performance, Bell Atlantic-NY may, if agreed by DPS staff, cure the defect and continue the test beyond its initial testing period.

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5. ENSURING CONTINUED PERFORMANCE AFTER INTERLATA ENTRY

Bell Atlantic-NY will continue to provide service to competitors at the levels the FCC, DOJ and PSC deem appropriate in permitting InterLATA entry in New York. By way of assurance, the company has agreed to be bound by the conditions set forth in this section.

Jurisdiction

Since the public interest will be well served by New York Public Service Commission review of standards and corrective measures, Bell Atlantic-NY will respectfully request that the FCC authorize the New York Public Service Commission to enforce the standards, corrective measures and conditions set forth herein, pursuant to the FCC's authority to preserve the "public interest" in reviewing 271 applications. The company will agree to objective criteria that can be readily monitored by all interested parties, including but not limited to the competitive local exchange companies and the New York Public Service Commission Staff, and will agree to significant price adjustments for non-compliance with the standards established. In return for the commitments contained herein, the company will request that the FCC not take duplicative action, with the mutual understanding that if the corrective action ordered by the New York Public Service Commission is deemed to be insufficient by the FCC, the Commission may reconsider its position.

Standards

Bell Atlantic-NY's performance will be monitored in two tracks; the first is designed to measure the company's overall §271 performance, while the second will measure performance in a more limited number of critical areas. With the exception of several additions, the measurements and standards are taken directly from the Interim Guidelines for Carrier-to-Carrier Performance Standards and Reports (Case 97-C-0139), which were established in the collaborative effort involving Bell Atlantic-NY, the CLECs, and representatives of various state agencies and consumer groups, under the supervision of the

New York State Public Service Commission. These standards, which were approved by the NY Commission as Interim Guidelines, have also been reviewed by the Department of Justice. These standards, which are set forth in Appendix 1, therefore represent the interests of a broad body of stakeholders.

1) Overall Performance

The numerous individual standards have been aggregated into three overall measures, which correlate to the three methods CLECs will use to enter the market: Resale, UNE and Interconnection. The individual standards have been weighted to emphasize individual categories, which will be aggregated to produce an overall score in each of the categories.

2) Critical Measure Performance

Bell Atlantic-NY recognizes that its performance in ten particular categories is critical to the CLECs' ability to compete in New York. The company has therefore agreed that, should its performance miss the standard in even *one* of these categories, price reductions or other corrective action will be triggered.

Measurement

In order to ensure that there is timely information regarding Bell Atlantic-NY's performance under these standards, the company will report its performance for each metric on a monthly basis. Reporting will be accomplished through the following actions:

1. Bell Atlantic-NY will report any difference between its actual performance and the related standard, using a statistics-based scoring method involving standard deviations around the Bell Atlantic and CLEC measurements for each standard.[1]

2. The performance score will then be weighted, based on the importance of the metric.

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[1] The NYPSC will have the right to examine the actual data (when it becomes available) in order to ensure that any statistical system is valid and reasonable, and to make appropriate adjustments if necessary. At least one quarter's worth of actual data would need to be examined.

3. The weighted scores shall then be aggregated by the mode of competitive entry (Resale, UNE, Interconnection), producing an overall score in each of the three classifications.

4. Ten highly significant categories have been added to a separate list of "Critical Measures," which will each carry their own corrective action.

Corrective Action

Should Bell Atlantic-NY's performance not meet the agreed upon standards, corrective action in the form of reduced wholesale prices will be taken. Unsatisfactory action for an extended period of time will result in additional corrective action.

Term of Backslide Measures

These backslide protections will remain in effect until Bell Atlantic obtains approval to eliminate its Section 272 affiliate. At that point, the parties will reconvene for purposes of reevaluating the appropriateness of the standards, measurements and corrective action. Until such time as a replacement mechanism is developed, this plan shall remain in effect.

Reporting

In addition to providing monthly performance measures, Bell Atlantic-NY shall make available, in electronic format, the data underlying these measures. Bell Atlantic-NY will also report data on the categories set forth in the Appendix, and will continue to report on all 93 measures established in the carrier-to-carrier service quality collaborative.

6. ADDITIONAL STEPS TO OPEN THE LOCAL MARKET

Number Portability

With the move to full number portability, 39 Bell Atlantic-NY central offices in LATA 132 are now able to accommodate long-term number portability. The process of cutting central offices in the New York MSA will continue through March, 1998, and all upstate MSAs on the FCC's original schedule will be able to accommodate long-term number portability by the end of 1998. Bell Atlantic-NY will adhere to the current schedule established by the FCC for the 100 largest MSAs in the country, and will adhere to any future schedules established for other areas of the State.

Applicant's Intentions

The commitments made by Bell Atlantic-NY in its filing and in this Prefiling Statement are intended to satisfy not only the competitive checklist of Section 271 (c)(2)(B), but the public interest standard found in Section 271 (d)(3)(C). If the applicant receives authority to provide interLATA services in return for these commitments, the applicant will keep these commitments--irrespective of actions in judicial rulings that may reduce the company's obligations under the Telecommunications Act of 1996 or other state or federal statutes, decisions or regulations.

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CARRIER TO CARRIER
PERFORMANCE STANDARDS AND REPORTS
INTERIM GUIDELINES 1/98 - 12/98
BELL ATLANTIC - NEW YORK

		BA Measure	CLEC Measure	Performance Score	Standards Importance Multiple	Weight	Percent Missed Score
	Resale Standards						
	PRE-ORDERING						
	Metric A - Response Time OSS Interface						
1	Customer Service Record	0	0	0	15	2.6%	0.0%
3	Due Date Availability	0	0	0	1	0.2%	0.0%
4	Address Validation	0	0	0	1	0.2%	0.0%
5	Product and Service Availability	0	0	0	1	0.2%	0.0%
6	Telephone Number Availability and Reservation	0	0	0	1	0.2%	0.0%
7	Metric B - OSS Response Time (Average)	0	0	0	20	3.5%	0.0%
	CONTACT CENTER AVAILIBILITY						
	Metric C - Availability of Centers for CLECS - No Reports	0.0%	0.0%	0	10	1.8%	0.0%
	ORDERING						
	Metric D - Order Confirmation Timeliness						
9	% Order Confirmation within 24 hours (N-Mech < 10 lines)	0.0%	0.0%	0	10	1.8%	0.0%
10	% Order Confirmation within 48 hours (N-Mech < 10 lines)	0.0%	0.0%	0	10	1.8%	0.0%
12	% Order Confirmation within 72 hours (All Orders >10 lines)	0.0%	0.0%	0	10	1.8%	0.0%
14	% Order Confirmation within 2 hours (Flow-Thru)	0.0%	0.0%	0	15	2.6%	0.0%
	Metric E - Reject Notice Timeliness						
19	% Reject Within 24 Hours (N-Mech < 10 lines)	0.0%	0.0%	0	10	1.8%	0.0%
21	% Reject within 48 Hours (N-Mech < 10 lines)	0.0%	0.0%	0	10	1.8%	0.0%
23	% Reject within 2 Hours (Flow-Thru)	0.0%	0.0%	0	10	1.8%	0.0%
24	% Reject within 72 Hours (All Orders > 10 lines)	0.0%	0.0%	0	10	1.8%	0.0%
	Metric G - Timeliness of Completion Notification						
29	Completion Notification - % On Time	0.0%	0.0%	0	15	2.6%	0.0%
30	Metric H - % Flow Through Orders	0.0%	0.0%	0	20	3.5%	0.0%
	PROVISIONING						
	Metric I - Average Offered Interval						
	Metric J - Average Completed Interval						
40	Average Interval Completed - Total - No dispatch	0	0	0	10	1.8%	0.0%
44	Average Interval Completed - Dispatch (1-5 lines)	0	0	0	10	1.8%	0.0%
48	Average Interval Completed - Dispatch (6-9 lines)	0	0	0	5	0.9%	0.0%
49	Average Interval Completed - Dispatch (>10 lines)	0	0	0	5	0.9%	0.0%
50	Average Interval Completed - Total Dispatch	0	0	0	20	3.5%	0.0%
51	Average Interval Completed DS0	0	0	0	15	2.6%	0.0%
52	Average Interval Completed DS1	0	0	0	15	2.6%	0.0%
53	Average Interval Completed DS3	0	0	0	15	2.6%	0.0%
	Metric K - % Completed within 5 Days						
56	% Completed within 5 Days (1-5 lines) - Total	0.0%	0.0%	0	15	2.6%	0.0%
	Metric L - % Missed Appointment - Company						
58	% Missed Appointment - BA - Total	0.0%	0.0%	0	20	3.5%	0.0%
59	Average Delay Days - Total	0	0	0	10	1.8%	0.0%
61	% Missed Appointment - BA - Dispatch	0.0%	0.0%	0	5	0.9%	0.0%
62	% Missed Appointment - BA - No Dispatch	0.0%	0.0%	0	5	0.9%	0.0%
63	Metric M - % Missed Appointment - Facilities	0.0%	0.0%	0	10	1.8%	0.0%
	Metric N - % Installation Troubles within 30 Days						
64	POTS: % Installation Troubles within 30 days	0.0%	0.0%	0	5	0.9%	0.0%
	TROUBLE REPORTING (OSS)						
	Metric O - Response Time OSS Interface						
66	Create Trouble	0	0	0	10	1.8%	0.0%
67	Status Trouble	0	0	0	10	1.8%	0.0%
68	Modify Trouble	0	0	0	10	1.8%	0.0%
69	Request Cancellation of Trouble	0	0	0	10	1.8%	0.0%
70	Trouble Report History (by TN/Circuit)	0	0	0	10	1.8%	0.0%
71	Test (POTS only)	0	0	0	10	1.8%	0.0%
	MAINTENANCE						
	Metric P - Network Trouble Reports						
72	Network Trouble Report Rate	0	0	0	20	3.5%	0.0%
74	Network Trouble Report Rate - Loop	0.0%	0.0%	0	1	0.2%	0.0%
75	Network Trouble Report Rate - Central Office	0.0%	0.0%	0	1	0.2%	0.0%
	Metric Q - % Missed Repair Appointments						
76	% Missed Repair Appointments - Dispatched (Loop)	0.0%	0.0%	0	20	3.5%	0.0%
77	% Missed Repair Appointments - Not Dispatched (CO)	0.0%	0.0%	0	1	0.2%	0.0%
78	% Missed Repair Appointments - Not Dispatched Total	0.0%	0.0%	0	15	2.6%	0.0%
	Metric R - Mean Time to Repair [time to restore]						
79	*Mean Time to Repair*	0	0	0	15	2.6%	0.0%
80	Mean Time to Repair - Loop Trouble	0	0	0	5	0.9%	0.0%
81	Mean Time to Repair - CO Trouble	0	0	0	5	0.9%	0.0%
	Metric S - % Out of Service > 24 Hours						
82	% Out of Service > 2 hours (blocking)	0.0%	0.0%	0	1	0.2%	0.0%
83	% Out of Service > 4 hours	0.0%	0.0%	0	5	0.9%	0.0%
84	% Out of Service > 12 hours	0.0%	0.0%	0	5	0.9%	0.0%
85	% Out of Service > 24 Hours	0.0%	0.0%	0	20	3.5%	0.0%
86	% All Troubles Cleared within 24 hours	0.0%	0.0%	0	10	1.8%	0.0%
87	Metric T - % Repeat Reports within 30 days	0.0%	0.0%	0	15	2.6%	0.0%
	BILLING						
	Metric V - Timeliness of Daily Usage Feed						
90	% DUF in 4 Business Days	0.00%	0.00%	0	10	1.8%	0.0%
91	% DUF in 5 Business Days	0.00%	0.00%	0	10	1.8%	0.0%
93	Metric W - Timeliness of Carrier Bill	0.0%	0.0%	0	15	2.6%	0.0%

	CARRIER TO CARRIER PERFORMANCE STANDARDS AND REPORTS INTERIM GUIDELINES 1/98 - 12/98 BELL ATLANTIC - NEW YORK	BA Measure	CLEC Measure	Performance Score	Standard's Importance Multiple	Weight	Percent Missed Score
	UNE Standards						
	PRE-ORDERING						
	Metric A - Response Time OSS Interface						
1	Customer Service Record	0	0	0	15	2.6%	0.0%
3	Due Date Availability	0	0	0	1	0.2%	0.0%
4	Address Validation	0	0	0	1	0.2%	0.0%
5	Product and Service Availability	0	0	0	1	0.2%	0.0%
6	Telephone Number Availability and Reservation	0	0	0	1	0.2%	0.0%
7	Metric B - OSS Response Time (Average)	0	0	0	20	3.5%	0.0%
	Metric C - Availability of Centers for CLECS - No Reports	0.0%	0.0%	0	10	1.8%	0.0%
	ORDERING						
	Metric D - Order Confirmation Timeliness						
9	% Order Confirmation within 24 hours (N-Mech < 10 lines)	0.0%	0.0%	0	10	1.8%	0.0%
10	% Order Confirmation within 48 hours (N-Mech < 10 lines)	0.0%	0.0%	0	10	1.8%	0.0%
12	% Order Confirmation within 72 hours (All Orders >10 lines)	0.0%	0.0%	0	10	1.8%	0.0%
14	% Order Confirmation within 2 hours (Flow-Thru)	0.0%	0.0%	0	15	2.6%	0.0%
	Metric E - Reject Notice Timeliness						
19	% Reject Within 24 Hours (N-Mech < 10 lines)	0.0%	0.0%	0	10	1.8%	0.0%
21	% Reject within 48 Hours (N-Mech < 10 lines)	0.0%	0.0%	0	10	1.8%	0.0%
23	% Reject within 2 Hours (Flow-Thru)	0.0%	0.0%	0	10	1.8%	0.0%
24	% Reject within 72 Hours (All Orders > 10 lines)	0.0%	0.0%	0	10	1.8%	0.0%
27	Metric F - % Rejects	0.0%	0.0%				
	Metric G - Timeliness of Completion Notification						
29	Completion Notification - % On Time	0.0%	0.0%	0	15	2.6%	0.0%
30	Metric H - % Flow Through Orders	0.0%	0.0%	0	20	3.5%	0.0%
	PROVISIONING						
	Metric I - Average Offered Interval						
	Metric J - Average Completed Interval						
40	Average Interval Completed - Total - No dispatch	0	0	0	10	1.8%	0.0%
44	Average Interval Completed - Dispatch (1-5 lines)	0	0	0	10	1.8%	0.0%
48	Average Interval Completed - Dispatch (6-9 lines)	0	0	0	5	0.9%	0.0%
49	Average Interval Completed - Dispatch (>10 lines)	0	0	0	5	0.9%	0.0%
50	Average Interval Completed - Total Dispatch	0	0	0	20	3.5%	0.0%
51	Average Interval Completed DS0	0	0	0	15	2.6%	0.0%
52	Average Interval Completed DS1	0	0	0	15	2.6%	0.0%
53	Average Interval Completed DS3	0	0	0	15	2.6%	0.0%
	Metric K - % Completed within 5 Days						
56	% Completed within 5 Days (1-5 lines) - Total	0.0%	0.0%	0	15	2.6%	0.0%
	Metric L - % Missed Appointment - Company						
58	% Missed Appointment - BA - Total	0.0%	0.0%	0	20	3.5%	0.0%
59	Average Delay Days - Total	0	0	0	10	1.8%	0.0%
61	% Missed Appointment - BA - Dispatch	0.0%	0.0%	0	5	0.9%	0.0%
62	% Missed Appointment - BA - No Dispatch	0.0%	0.0%	0	5	0.9%	0.0%
63	Metric M - % Missed Appointment - Facilities	0.0%	0.0%	0	10	1.8%	0.0%
	Metric N - % Installation Troubles within 30 Days						
64	POTS: % Installation Troubles within 30 days	0.0%	0.0%	0	5	0.9%	0.0%
	MAINTENANCE & TROUBLE REPORTING (OSS)						
	Metric O - Response Time OSS Interface						
66	Create Trouble	0	0	0	10	1.8%	0.0%
67	Status Trouble	0	0	0	10	1.8%	0.0%
68	Modify Trouble	0	0	0	10	1.8%	0.0%
69	Request Cancellation of Trouble	0	0	0	10	1.8%	0.0%
70	Trouble Report History (by TN/Circuit)	0	0	0	10	1.8%	0.0%
71	Test (POTS only)	0	0	0	10	1.8%	0.0%
	MAINTENANCE						
	Metric P - Network Trouble Report Rate						
72	Network Trouble Report Rate	0	0	0	20	3.5%	0.0%
74	Network Trouble Report Rate - Loop	0.0%	0.0%	0	1	0.2%	0.0%
75	Network Trouble Report Rate - Central Office	0.0%	0.0%	0	1	0.2%	0.0%
	Metric Q - % Missed Repair Appointments						
76	% Missed Repair Appointments - Dispatched (Loop)	0.0%	0.0%	0	20	3.5%	0.0%
77	% Missed Repair Appointments - Not Dispatched (CO)	0.0%	0.0%	0	1	0.2%	0.0%
78	% Missed Repair Appointments - Not Dispatched Total	0.0%	0.0%	0	15	2.6%	0.0%
	Metric R - Mean Time to Repair (time to restore)						
79	Mean Time to Repair	0	0	0	15	2.6%	0.0%
80	Mean Time to Repair - Loop Trouble	0	0	0	5	0.9%	0.0%
81	Mean Time to Repair - CO Trouble	0	0	0	5	0.9%	0.0%
	Metric S - % Out of Service > 24 Hours						
82	% Out of Service > 2 hours (blocking)	0.0%	0.0%	0	1	0.2%	0.0%
83	% Out of Service > 4 hours	0.0%	0.0%	0	5	0.9%	0.0%
84	% Out of Service > 12 hours	0.0%	0.0%	0	5	0.9%	0.0%
85	% Out of Service > 24 Hours	0.0%	0.0%	0	20	3.5%	0.0%
86	% All Troubles Cleared within 24 hours	0.0%	0.0%	0	10	1.8%	0.0%
87	Metric T - % Repeat Reports within 30 Days	0.0%	0.0%	0	15	2.6%	0.0%
	BILLING						
	Metric V - Timeliness of Daily Usage Feed						
90	% DUF in 4 Business Days	0.00%	0.00%	0	10	1.8%	0.0%
91	% DUF in 5 Business Days	0.00%	0.00%	0	10	1.8%	0.0%
93	Metric W - Timeliness of Carrier Bill	0.0%	0.0%	0	15	2.6%	0.0%

CARRIER TO CARRIER
PERFORMANCE STANDARDS AND REPORTS
INTERIM GUIDELINES 1/98 - 12/98
BELL ATLANTIC - NEW YORK

		BA Measure	CLEC Measure	Performance Score	Standard's Importance Multiple	Weight	Percent Missed Score
	Interconnection Standards						
	PRE-ORDERING						
	Metric A - Response Time OSS Interface						
1	Customer Service Record	0	0	0	0	0.0%	0.0%
3	Due Date Availability	0	0	0	1	0.3%	0.0%
4	Address Validation	0	0	0	0	0.0%	0.0%
5	Product and Service Availability	0	0	0	0	0.0%	0.0%
6	Telephone Number Availability and Reservation	0	0	0	0	0.0%	0.0%
7	Metric B - OSS Response Time (Average)	0	0	0	20	6.2%	0.0%
	Metric C - Availability of Centers for CLECS - No Reports	0.0%	0.0%	0	5	1.5%	0.0%
	ORDERING						
	Metric D - Order Confirmation Timeliness						
16	% Firm Order Confirmation > 10 Days	0.0%	0.0%	0	15	4.6%	0.0%
17	Timeliness of Design Layout Record	0	0	0	15	4.6%	0.0%
	Metric E - Reject Notice Timeliness						
26	% Rejects > 10 Business Days	0.0%	0.0%	0	10	3.1%	0.0%
	Metric G - Timeliness of Completion Notification						
29	Completion Notification - % On Time	0.0%	0.0%	0	5	1.5%	0.0%
30	Metric H - % Flow Through Orders	0.0%	0.0%	0	20	6.2%	0.0%
	PROVISIONING						
54	Metric J - Average Completed Interval - Total	0	0	0	20	6.2%	0.0%
	Metric L - % Missed Appointment - Company						
58	% Missed Appointment - BA - Total	0.0%	0.0%	0	20	6.2%	0.0%
59	Average Delay Days - Total	0.0%	0.0%	0	10	3.1%	0.0%
63	Metric M - % Missed Appointment - Facilities	0.0%	0.0%	0	10	3.1%	0.0%
64	Metric N - POTS: % Installation Troubles within 30 days	0.0%	0.0%	0	15	4.6%	0.0%
	TROUBLE REPORTING (OSS)						
	Metric O - Response Time OSS Interface						
66	Create Trouble	0	0	0	10	1.8%	0.0%
67	Status Trouble	0	0	0	10	1.8%	0.0%
68	Modify Trouble	0	0	0	10	1.8%	0.0%
9	Request Cancellation of Trouble	0	0	0	10	1.8%	0.0%
70	Trouble Report History (by TN/Circuit)	0	0	0	10	1.8%	0.0%
71	Test (POTS only)	0	0	0	10	1.8%	0.0%
	MAINTENANCE						
	Metric P - Network Trouble Report Rate						
72	Network Trouble Report Rate	0	0	0	20	6.2%	0.0%
	Metric Q - % Missed Repair Appointments						
78	% Missed Repair Appointments - Not Dispatched Total	0.0%	0.0%	0	10	3.1%	0.0%
79	Metric R - Mean Time to Repair (time to restore)	0.0%	0.0%	0	15	4.6%	0.0%
	Metric S - % Out of Service > 24 Hours						
82	% Out of Service > 2 hours (blocking)	0.0%	0.0%	0	20	6.2%	0.0%
83	% Out of Service > 4 hours	0.0%	0.0%	0	1	0.3%	0.0%
84	% Out of Service > 12 hours	0.0%	0.0%	0	1	0.3%	0.0%
85	% Out of Service > 24 Hours	0.0%	0.0%	0	1	0.3%	0.0%
86	% All Troubles Cleared within 24 hours	0.0%	0.0%	0	1	0.3%	0.0%
87	Metric T - % Repeat Reports within 30 Days	0.0%	0.0%	0	10	3.1%	0.0%
	NETWORK PERFORMANCE						
	Metric U - % Final Trunk Blockage						
88	% Final Trunk Groups exceeding blocking Design standard	0.0%	0.0%	0	20	6.2%	0.0%

BELL ATLANTIC - NEW YORK
Carrier to Carrier Performance Standards and Reports
CRITICAL MEASURES FOR 271

		RESALE	UNE	INTER-CONNECTION	TOTAL
	PRE-ORDERING				
	Metric B - OSS Response Time (average)	0	0	0	0
	PROVISIONING				
	NIA Physical Co-Location		0		0
	Average Interval Completed - Total Dispatch	0	0		0
54	Metric J - Average Completed Interval - Total			0	0
58	% Missed Appointment - BA - Total	0	0	0	0
	MAINTENANCE				
72	Network Trouble Report Rate	0	0	0	0
76	% Missed Repair Appointments - Dispatched (Loop)	0	0		0
	% Out of Service > 2 hours (blocking)			0	0
85	% Out of Service > 24 Hours	0	0		0
	NETWORK PERFORMANCE				
88	% Final Trunk Groups exceeding blocking design standard			0	0
	TOTAL	0	0	0	0